



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 16, 2020

By Email and ECF

Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019.¹ See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

¹ Please advise whether you have received CNEX discovery from Bo Mao pursuant to your Joint Defense Agreement or whether the government should separately produce said records to you.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Accounting and payroll records	Discovery Material	DOJ_HUAWEI_A_0004755153 – DOJ_HUAWEI_A_0004778536

Very truly yours,

RICHARD P. DONOGHUE
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By: /s/ Thea D. R. Kendler
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David Lim
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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)